

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE: ) Chapter 11  
BRADLYNN CORP INC. ) Case No.: 23-12142  
Debtor, )  
\_\_\_\_\_  
)

**MOTION TO EXTEND THE TIME FOR RESPONDING TO THE ORDER TO UPDATE  
THE RECONCILIATION OF BUDGET AND EXPENSES**

Now comes the Debtor, Bradlynn Corp. Inc., through proposed Counsel and hereby requests this Honorable Court to extend the deadline for Responding to the Order to Update for 14 days for reasons therefore:

Counsel for the Debtor requires additional time to submit the reconciliation of budget and expenses. The Debtor, having recently given birth (two weeks ago) has caused a delay in their ability to provide the requested documents promptly.

WHEREFORE, the Debtor, Bradlynn Corp. Inc., through proposed Counsel hereby requests this Honorable Court to extend the deadline for Responding to the Order to Update for 14 days.

Respectfully Submitted,  
The Debtor,  
By Its Attorney,  
/s/ Peter M. Daigle  
Peter M. Daigle, Esquire  
BBO # 640517  
1550 Falmouth Road, Suite 10  
Centerville, MA 02632  
(508) 771-7444

Dated: March 28, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a duplicate copy of the above to be served upon all parties of record by electronic mail or by First Class Mail postage prepaid.

/s/ Peter M. Daigle  
Peter M. Daigle, Esquire

Dated: March 28, 2024

**Electronic Mail/ECF:**

Richard King, Asst. US Trustee

David Madoff, Sub V Trustee

**Fax/Email/Overnight Mail:**

**Internal Revenue Service**

PO Box 7346  
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**Massachusetts Department of Revenue**

Bankruptcy Unit  
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**Massachusetts Department of Unemployment Assistance**

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**Air Energy**  
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